



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

September 20, 2013

MEMORANDUM

Subject: Arkwood, Inc. Superfund Site - Comments on the Conceptual Site Model and Proposed Decision Unit Plan

From: Jon Rauscher, Ph.D.
Toxicologist

To: Stephen Tzhone
Remedial Project Manager

This memorandum provides comments on the document entitled "Conceptual Site Model and Proposed Decision Unit Plan for the Arkwood, Inc. Site."

Comments:

1. Page 4, Conceptual Site Model Information: The inhalation exposure pathway is likely to be negligible but pathway should not be excluded from the conceptual site model (CSM). The inhalation pathway at a minimum should be addressed qualitatively and the necessity for a quantitative examination of the pathway should be reevaluated after the site visit.

The surface water and groundwater exposure pathways were excluded from the CSM. The exclusion of the surface water and groundwater pathways may need to be addressed after the examination of dioxin soil levels.

2. Page 6, Proposed Decision Unit Plan: Decision Unit (DU) #1 was suggested as an area that likely represents background concentrations of polychlorinated dibenzo-p-dioxin and dibenzofuran (PCDD/Fs). Generally on-site areas are not considered to represent background concentrations. The use of DU #1 as the background or reference concentration should be reexamined after the site visit. Due to the size of DU #2, DU #2 may need to be divided in units of smaller size DUs. Whether DU #2 needs to be subdivided should be reevaluated after the site visit. The appropriateness of all of the proposed DUs should be reevaluated after the site visit.
3. Page 7, Conclusions: As the work plan is being prepared by McKesson and their contractor, they should consider the comments provided by EPA Headquarters.